

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

**FEE APPLICATION COVER SHEET FOR THE
PERIOD AUGUST 1, 2022 THROUGH AUGUST 31, 2022**

Debtor: LTL Management LLC

Applicant: Taurig Law LLC

Case No.: 21-30589-MBK

Client: Counsel to Robert J. Keach, Esq.,
(the "Fee Examiner")

Chapter: 11

Case Filed: October 14, 2021 (the "Petition
Date")

**SECTION 1
FEE SUMMARY**

☒ Monthly Fee Application No. 5 or ☐ Final Fee Application

Summary of Amounts Requested for the Period from August 1, 2022 through August 31, 2022 (the "Fifth Statement Period").

Total Fees:	\$ 2,337.50
Total Disbursements:	\$ 0.00
Total Fees Plus Disbursements:	\$ 2,337.50
Minus 20% Holdback of Fees:	\$ 467.50
Amount Sought at this Time:	\$ 1,870.00

	<u>FEEES</u>	<u>EXPENSES</u>
Total Previous Fees/Expenses Requested:	<u>\$13,260.00</u>	<u>\$50.00</u>
Total Fees/Expenses Allowed to Date:	<u>\$ 7,310.00</u>	<u>\$0.00</u>
Total Retainer (If Applicable):	<u>\$ 0.00</u>	<u>\$0.00</u>
Total Holdback (If Applicable):	<u>\$ 1,190.00</u>	<u>\$0.00</u>
Total Received by Applicant:	<u>\$ 12,070.00</u>	<u>\$50.00</u>

COMPENSATION BY PROFESSIONAL
AUGUST 1, 2022 THROUGH AUGUST 31, 2022

The attorney(s) who rendered professional services in this chapter 11 case during the Fifth Statement Period are:

Name of Professional: Partner/Member	Year Admitted	Hourly Rate	Total Hours Billed	Total Fees
Jeffrey Traurig	1997	\$425.00	5.5	\$ 2,337.50

The total fees for the Fifth Statement Period are:

Professionals	Blended Rate	Total Hours Billed	Total Fees
Partner/Member:	\$425.00	5.5	\$ 2,337.50
Blended Attorney Rate:	\$425.00	5.5	\$ 2,337.50
Blended Rate for All Timekeepers:	\$425.00	5.5	\$ 2,337.50
Total Fees Incurred:		5.5	\$ 2,337.50

**SECTION II
SUMMARY OF SERVICES**

**COMPENSATION BY WORK TASK CODE FOR SERVICES RENDERED
FOR THE PERIOD AUGUST 1, 2022 THROUGH AUGUST 31, 2022**

DESCRIPTION	HOURS	AMOUNT
Case Administration/General	N/A	N/A
Employment and Fee Applications	2.0	\$ 850.00
Employment and Fee Reports/Objections	3.5	\$ 1,487.50
Total Fees Requested	5.5	\$ 2,337.50

**SECTION III
SUMMARY OF DISBURSEMENTS**

**DISBURSEMENT SUMMARY
FOR THE PERIOD AUGUST 1, 2022 THROUGH AUGUST 31, 2022**

DISBURSEMENTS	AMOUNT
N/A	\$ 0.00
DISBURSEMENTS TOTALS	\$ 0.00

**SECTION IV
CASE HISTORY**

- | | |
|--|--|
| (1) Date cases filed: | October 14, 2021 |
| (2) Chapter under which case commenced: | Chapter 11 |
| (3) Date of retention order: | April 5, 2022 [Dkt. 1966] (the “ <u>Retention Order</u> ”). ¹ |
| (4) Summarize in brief the benefits to the estate and attach supplements as needed | SEE BELOW |

During the Fifth Statement Period, Traurig Law LLC (“Traurig Law”) provided the following services to Robert J. Keach, the Fee Examiner, including, but not limited to, the following:

Employment and Fee Applications

- Drafted monthly fee statement for Traurig Law; coordinated with Bernstein, Shur, Sawyer & Nelson, P.A. (“BSSN”) re BSSN and the Fee Examiner re July monthly fee statement review; filed July monthly fee statements, CNO’s and certificate of service for Traurig Law, BSSN and the Fee Examiner regarding monthly fee statements.

Employment and Fee Reports/Objections

- Communicated with the Fee Examiner and BSSN regarding the second interim final fee report, reviewed Debtor’s objection to fees and communicated with BSSN on same.
- Reviewed and filed the Fee Examiner’s second interim final fee report.

¹ The Retention Order is attached hereto as Exhibit A

(5) Anticipated distribution to creditors:

(a) Administration expense:	Unknown at this time.
(b) Secured creditors:	Unknown at this time.
(c) Priority creditors:	Unknown at this time.
(d) General unsecured creditors:	Unknown at this time.

(6) Final disposition of case and percentage of dividend paid to creditors

Final dividend percentages are unknown at this time.

I certify under penalty of perjury that the above is true.

Date: September 23, 2022

/s/ Jeffrey Traurig
Jeffrey Traurig

EXHIBIT A

Retention Order



Order Filed on April 5, 2022
by Clerk
U.S. Bankruptcy Court
District of New Jersey

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

Jeffrey Traurig
TRAURIG LAW LLC
One University Plaza, Suite 124
Hackensack, NJ 07601
Tel: (646) 974-8650
E-mail: jtraurig@trauriglawn.com
Proposed Local Counsel to the Fee Examiner

In Re:

LTL MANAGEMENT LLC,

Debtor

Case No.: 21-30589 (MBK)

Judge: Michael B. Kaplan

Chapter 11

**ORDER AUTHORIZING RETENTION OF TRAURIG LAW LLC
AS COUNSEL TO THE FEE EXAMINER**

The relief set forth on the following page two (2) and three (3) is hereby **ORDERED**.

DATED: April 5, 2022


Honorable Michael B. Kaplan
United States Bankruptcy Judge

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LTL MANAGEMENT LLC

Chapter 11, Case No.: 21-30589 (MBK)

Order Authorizing Retention of Traurig Law LLC As Counsel To The Fee Examiner

Upon the applicant's, Robert J. Keach (the "Fee Examiner"), request for authorization to retain Traurig Law LLC ("Taurig") as counsel to the Fee Examiner, it is hereby **ORDERED**:

1. The Fee Examiner is authorized to retain Traurig in the professional capacity noted in the Application.

The professional's address is: Traurig Law LLC
One University Plaza, Suite 124
Hackensack, NJ 07601

2. As provided in the *Order Appointing an Independent Fee Examiner and Establishing Procedures* [Docket No. 1922, ¶ 13], the "fees and expenses of the Fee Examiner, and any counsel retained pursuant to court order, shall be subject to application and review pursuant to section 330 of the Bankruptcy Code, Bankruptcy Rule 2016, Local Bankruptcy Rule 2016-1, the U.S. Trustee Guidelines, and the Interim Compensation Order, and shall be paid from the Debtor's estate as an administrative expense under section 503(b)(2) of the Bankruptcy Code. The Fee Examiner's expenses and those of any counsel retained pursuant to court order, shall be subject to the information detail requirements set forth in D.N.J. LBR 2016-1."

3. If the professional requested a waiver as noted below, it is ☐ Granted ☐ Denied.

☐ Waiver, under D.N.J. LBR 2014-2(b), of the requirements of D.N.J. LBR 2016-1.

☐ Waiver, under D.N.J. LBR 2014-3, of the requirements of D.N.J. LBR 2016-1 in a chapter 13 case. Payment to the professional may only be made after satisfactory completion of services.

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LTL MANAGEMENT LLC

Chapter 11, Case No.: 21-30589 (MBK)

Order Authorizing Retention of Traurig Law LLC As Counsel To The Fee Examiner

4. Traurig will only bill 50% for non-working travel and shall not seek the reimbursement of any fees or costs including attorney fees and costs, arising from the defense of any of Traurig's fee applications in this case.
5. Traurig will agree to make a reasonable effort to comply with the U.S. Trustee's requests for information and additional disclosures as set forth in the Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases Effective as of November 1, 2013 (the "U.S. Trustee Guidelines").
6. Traurig will use the billing and expense categories set forth in the US Trustee Guidelines (Exhibit D-1 "Summary of Compensation Requested by Project Category"), among other categories.
7. Traurig will provide any and all monthly fee statements, interim fee applications, and final fee tab applications in "LEDES" or other satisfactory format to the United States Trustee.
8. The effective date of retention is the date the application was filed with the Court.

EXHIBIT B

Invoice/Time Records

Traurig Law LLC
One University Plaza, Ste 124
Hackensack, NJ 07601

INVOICE

Robert J. Keach Fee Examiner -- LTL Management

Invoice 22037

Date	Sep 16, 2022
Terms	Court Order
Service Thru	Aug 31, 2022

In Reference To: LTL Management LLC (Fees)

Date	By	Services	Rate	Hours	Amount
Employment and Fee Applications					
08/02/2022	JT	Email with L. Boots re June monthly statement/CNO and July monthly statement issues for Traurig Law, BSSN and Fee Examiner (.1).	\$ 425.00	0.10	\$ 42.50
08/04/2022	JT	Draft CNOs for BSSN, Fee Examiner and Traurig law re June monthly statements (.2).	\$ 425.00	0.20	\$ 85.00
08/05/2022	JT	Review docket for objections/responses to June monthly fee statements for BSSN, Fee Examiner and Traurig Law, finalize CNOs and file same (.3); review and file COS re CNOS and emails with K. Quirk on same (.1).	\$ 425.00	0.40	\$ 170.00
08/08/2022	JT	Draft 4th monthly fee statement re Traurig Law and email to L. Boots on same (.5).	\$ 425.00	0.50	\$ 212.50
08/15/2022	JT	Email to L. Boots, K. Quirk re July monthly fee statements for BSSN, Fee Examiner and Traurig Law (.1).	\$ 425.00	0.10	\$ 42.50
08/23/2022	JT	Review and finalize Traurig Law July monthly fee statement (.1); review BSSN and Fee Examiner July monthly fee statements (.1); prepare and file Traurig Law, BSSN and Fee Examiner July monthly fee statements (.2); prepare LEDES file for UST and emails with L. Boots and K. Quirk re July monthly fee statements and LEDES file (.2); review and file COS from K. Quirk to monthly fee statement (.1).	\$ 425.00	0.70	\$ 297.50
Employment and Fee Applications Total:				2.00	\$850.00
Employment and Fee Reports/Objections					
08/08/2022	JT	Review scheduling and email with L. Boots re Fee Examiner 2nd Interim Fee Report (.1).	\$ 425.00	0.10	\$ 42.50
08/16/2022	JT	Review Debtor's objection to Committee application for fees and expenses, email to L. Boots on same (.2).	\$ 425.00	0.20	\$ 85.00
08/17/2022	JT	Call with L. Boots re Debtor objection to Committee fee application (.2).	\$ 425.00	0.20	\$ 85.00

Taurig Law LLC

One University Plaza, Ste 124
Hackensack, NJ 07601

INVOICE

Robert J. Keach Fee Examiner -- LTL Management

Invoice 22037

Date	Sep 16, 2022
Terms	Court Order
Service Thru	Aug 31, 2022

08/30/2022	JT	Review email from and call with L. Boots re Fee Examiner final report for 2/22 through 5/22 (.2); review debtor objection to Cooley and email to B. Keach and L. Boots re same (.2).	\$ 425.00	0.40	\$ 170.00
08/31/2022	JT	Emails with L. Boots and with B. Keach re Fee Examiner report, Debtor's objection (.2); review Fee Examiner report and exhibits (1.1); review proposed order and exhibits (.2); Call with L. Boots re Fee Examiner report, revisions and service (.2); review revised Fee Examiner report and exhibits and finalize for filing (.2); file Fee Examiner report, proposed order and link to 32 applications (.5); further call with L. Boots re service issues, review COS and related emails, filed COS (.2).	\$ 425.00	2.60	\$ 1,105.00

Employment and Fee Reports/Objections Total: 3.50 \$1,487.50

Total Fees Amount: 5.50 \$2,337.50

Total Hours 5.50 hrs

Total Fees \$ 2,337.50

Total Invoice Amount \$ 2,337.50
